

INEOS ABS

INEOS ABS (USA) Corporation

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April 21, 2011

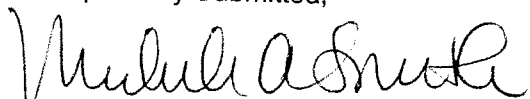
Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

RE: Consent Decree Civil Action No. 1:09-CV-545
Effective Date February 4, 2010

Dear Sirs:

Please find attached the Quarterly Report for First Quarter 2011. Please contact me at (513) 467-2470 or michele.smith@lustran-polymers.com if you have any questions concerning the submitted information.

Respectfully Submitted,



Michele A. Smith, P.E.
Environmental Specialist
INEOS ABS (USA) Corporation

cc: M. Palmero, USEPA Region 5
T. Kalman, OEPA
G. Bachmann, Ohio AG
M. Kramer, HCDOES

INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT
CONSENT DECREE QUARTERLY REPORT

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 01/01/11 – 03/31/11

I. INTRODUCTION

The following report contains the required information about INEOS ABS' compliance activities associated with the requirements in Paragraph 50 a. and 50 b. in the Consent Decree.

II. LEAK DETECTION AND REPAIR (LDAR) REPORTING OBLIGATIONS

Per Appendix A of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

A. COMPLIANCE STATUS REPORTS

The 2010 Compliance Status Report was submitted on January 19, 2011.

B. CORRECTIVE ACTION PLANS

The Corrective Action Plan for the 2010 external audit was completed on 09/21/10 and was submitted for approval on 12/21/10. Still awaiting approval. All corrective actions identified in the plan have been completed.

C. CERTIFICATE OF COMPLIANCE

The 2010 Certificate of Compliance was submitted on February 14, 2011.

III. FLARE MONITORING INSTRUMENTS REPORTING OBLIGATIONS

Per Paragraph 23 of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

- January 2011 Report submitted on February 4, 2011
- February 2011 Report submitted on March 4, 2011
- March 2011 Report submitted on April 5, 2011

IV. NONCOMPLIANCE WITH CONSENT DECREE

Per Paragraph 50 b. of the Consent Decree, INEOS ABS submitted the following letters of noncompliance to the U.S. EPA and Ohio EPA:

A. Missed Pump Monitoring – Letter Dated January 18, 2011

In November and December 2010, one process unit was down and all the pumps associated with that process unit were placed Out of Service until January 2011. However, two pumps associated with that process unit were for a piece of equipment that is also used by another process unit that was running. Therefore, these two pumps should have been monitored in November and December 2010. A list has

been created that indicates which pumps are common to more than one process unit. This list will be used when process units are down to determine which pumps should be placed Out of Service and which ones need to remain active. This will prevent future missed pump monitoring at the facility.

B. Missed Connector Monitoring – Letter Dated February 18, 2011

Connectors in an area of one process unit (MEK tank and unloading) were not monitored in 2010. These 110 connectors were monitored on February 15, 2011. Connectors at the facility were monitored by an outside contractor. The contractor used the facility Leak Detection and Repair (LDAR) drawings to identify and monitor the connectors. A drawing for this area was not given to the contractor and therefore, they did not complete the monitoring. Upon discovery, an audit was completed to determine if there were any other areas in the facility that had not been monitored; none were found.

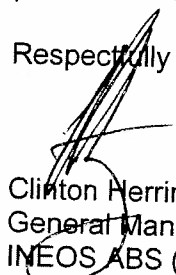
C. Missed Monitoring – Letter Dated March 25, 2011

One pump (#00017) that was on the Delay of Repair list was not monitored when it was brought back into Hazardous Air Pollutant (HAP) service. It was monitored eleven days after it was brought online. Three valves (#10411, #10412 and #10413) were added into the LDAR Program but had been in existence before 2010. These valves were subsequently monitored on March 24th, March 21st, and March 25th, respectively.

V. CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Respectfully Submitted,


Clinton Herring
General Manager, NAFTA
INEOS ABS (USA) Corporation